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**JUNE 18, 2005**

**DOCKET No. 05-015-1, REGULATORY ANALYSIS AND DEVELOPMENT  
PPD, APHIS, STATION 3C71  
4700 RIVER ROAD, UNIT 118  
RIVERDALE, MD. 30737-1238**

**DEAR SIRs:**

**I HAVE SOME COMMENTS ON THE NATL. ID STRATEGIC PLAN. FIRST OF ALL, I FEEL THAT WE BEEF PRODUCERS ARE FALLING FURTHER BEHIND EVERY DAY THAT GOES BY WITHOUT SOME CLEAR DIRECTION. OUR COMPETITORS ARE TAKING OVER OUR MARKETS AND IT IS BEING SHOWN THAT THE CONSUMERS WORLDWIDE WANT TO KNOW MORE ABOUT WHAT THEY ARE CONSUMING. THE PROPOSED TIME FRAME IS WAY TOO SLOW TO GET THIS KNOWLEDGE GAP FILLED.**


**IN MY CASE, I HAVE HAD INDIVIDUAL ID FOR WELL OVER 20 YEARS AND THE MANAGEMENT VALUE ON HAVING THIS ID OUTWEIGHS THE COST. I DON'T BELIEVE GOVERNMENT SHOULD BE PAYING FOR THIS SERVICE. THEY DO HAVE A ROLL IN ASSIMILATING THE DATA, AS NEEDED, FOR DISEASE AND HEALTH RELATED ISSUES. I STRONGLY FEEL THAT PRIVATE ENTERPRISE SHOULD BE ALLOWED TO MANAGE THE DATA, WITH PROPER ACCESS BY STATE AND FEDERAL AGENCIES TO THE DATABASE WHEN AN ANIMAL HEALTH ISSUE ARISES. I SEE MARKETING OPPORTUNITIES IN THIS ID SYSTEM THAT CAN BE ACCOMPLISHED WITH ONE SYSTEM INSTEAD OF REDUNDANT SYSTEMS.**

**CURRENTLY, WE DO NOT USE THE ELECTRONIC TAGGING SYSTEM BUT I DO AGREE THAT THE NAIS SYSTEM MAKES THE MOST SENSE OF WHAT I'VE SEEN ON THE MARKET. WE CAN ADAPT TO THAT SYSTEM. WE HAVE OUR PREMISE ID AND HAVE GONE THROUGH A FIELD AUDIT FOR SOURCE AND AGE TRACE ABILITY BY STERLING SOLUTIONS OF VALE, OREGON. WE RECENTLY RECEIVED A \$10 PER HEAD PREMIUM ON FAT CATTLE SOLD UNDER THIS AUDIT.**

**FINALLY, I BELIEVE THIS SYSTEM MUST BE MANDATORY FROM THE ANIMAL HEALTH AND HOMELAND SECURITY PERSPECTIVE; OTHERWISE THE INDUSTRY GETS A BLACK EYE EVERY TIME A HEALTH ISSUE HITS THE PRESS AND WE, THE INDUSTRY NEED THE REGULATORY ARM TO GIVE OUR DOMESTIC AND FOREIGN CUSTOMERS THE CONFIDENCE TO BUY OUR PRODUCT.**

**IN SUMMARY, (1) SPEED UP THE PROCESS, (2) LET PRIVATE ENTERPRISE HANDLE THE DATA WITH SAFEGUARDS FOR THE REGULATORS ACCESS TO THE DATA, AND (3) MAKE THE SYSTEM MANDATORY.**

**VERY SINCERELY,**

  
**JAMES A. LITTLE  
V DOT CATTLE Co.**

**RECEIVED**

**JUN 23 2005**